

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

CHERYL COMPTON, et al., )  
                                 )  
Plaintiffs,                 )  
                                 )      **No. 4:11-CV-01975 CEJ**  
v.                            )  
                                 )  
ST. LOUIS METROPOLITAN POLICE )  
DEPARTMENT, et al.,         )  
                                 )  
Defendants.                 )

**DEFENDANT CITY OF ST. LOUIS' VERIFIED STATEMENT OF  
REASONABLE ATTORNEYS' FEES**

COMES NOW Defendant City of St. Louis, Missouri ("City"), by and through undersigned counsel, and pursuant to the Court's Order dated December 31, 2012 [Doc. #70], files the following Verified Statement of Reasonable Attorneys' Fees in the above matter:

1. At all times relevant to this filing, Associate City Counselor Daniel J. Emerson was employed as an Attorney III for the City, and his hourly billing rate in that capacity for Civil Rights cases is \$275.00 per hour. *See Exhibit A (Affidavit of Daniel J. Emerson) at ¶ 5.*

2. Mr. Emerson expended 16.7 hours at an hourly rate of \$275.00, for a total of \$4,592.50 in reasonable attorneys' fees expended as a direct result of plaintiffs' failure to respond to discovery. *Id. at ¶¶ 6 & 7.*

3. The City did not incur any taxable court costs as a direct result of plaintiff's failure to respond to discovery. *Id. at ¶ 8.*

WHEREFORE, the City prays an Order from the Court granting award of \$4,592.50 in reasonable attorneys' fees against the plaintiffs in this matter and for such other and further relief as the Court deems fair and reasonable under the premises.

Respectfully submitted,  
PATRICIA A. HAGEMAN  
CITY COUNSELOR

/s/ Daniel J. Emerson

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**Certificate of Service**

I hereby certify that on January 31, 2013, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon:

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